Filed: June 19, 2001

REMARKS

Claims 1-19 remain pending in the present application. Applicants thank the Examiner for indication that claims 6-17 contain allowable subject matter. Claims 1 and 2 have been amended to further clarify that which was previously claimed. In addition, claim 2 has been amended to comply with the Examiner's request for correction. A marked-up version of claims 1 and 2 is included herewith as an attachment. Reconsideration and allowance of the pending claims is respectfully requested in view of the following comments.

Claim Rejections pursuant to 35 U.S.C. §102(b)

Claims 1-5 stand rejected pursuant to 35 U.S.C. §102(b) as being anticipated by European Patent Publication EP 0369434 (herein after referred to as EP '434). In addition, claims 1-3 stand rejected pursuant to 35 U.S.C. §102(b) as being anticipated by European Patent Publication EP 049317 (hereinafter referred to as EP '317). Applicants respectfully traverse these rejections for at least the following reasons and request reconsideration.

The Examiner has continued to assert that Figure 5A of EP '434 discloses the method of making a woven spider disclosed by claim 1 and the method of making a moving coil transducer disclosed by claim 2. Figure 5A of EP '434 teaches a speaker damper configuration in which a conductive member (2) is sewn to a damper (1) using thread (3). (Col. 6 lines 7-9 and Figs. 5A-5B) Clearly, the conductive member of EP '434 is not wrapped around the thread as disclosed by claims 1 and 2. Since the conductive member is not wrapped around the thread, it follows that EP '434 also does not teach weaving the wrapped thread at a select location in a cloth as in claims 1 and 2. For at least the foregoing reasons, Applicants respectfully request removal of the 35 U.S.C. §102(b)

Filed: June 19, 2001

rejection of claims 1 and 2. Since dependent claims 3-5 depend from independent claim 2, removal of the rejection of claims 3-5 is also requested for the same reasons.

The Examiner has also continued to assert that Figure 9 of EP '317 teaches all the elements disclosed by claims 1-3. EP '317 teaches a method of making loudspeaker dampers by treating a woven cloth (1, 1F) and either sewing wires (2, 2H) to the woven cloth (Figs. 2, 3 and 6) or interleaving the wires (2B, 2C) into the woven cloth (1F) (Figs. 8 and 9). In addition, EP '317 teaches that after sewing, the wires (2H) may be coated in a predetermined area with a creamy solder (CH). (Col. 5 lines 6-9) The woven cloth is thermally molded in a mold and the creamy solder is heated. (Col. 5 lines 28-34) When the woven cloth is removed from the mold, the creamy solder melts to form preparatory solder (H) that is fixedly attached to the wires. (Col. 5 lines 33-37)

In the rejection based on EP '317, the Examiner has indicated that EP '317 discloses "wrapping a selected thread H with an electrical conductor 2H and weaving the wrapped thread in the cloth (shown in Fig. 9)." The element "H" to which the Examiner is referring appears in Figures 5 and 6 and is the previously described preparatory solder that is fixedly attached to the wires identified as 2H. Applicants are unable to identify where EP '317 discloses wrapping an electrical conductor around a thread as disclosed by claims 1 and 2. In fact, EP '317 teaches away from the invention disclosed by claims 1 and 2 by teaching that wires alone are interleaved into the woven cloth (Fig. 9, Col. 5 line 58 and Col. 6 lines 1-4).

For at least the foregoing reasons, Applicants respectfully request removal of the 35 U.S.C. §102(b) rejection of claims 1 and 2. Since dependent claim 3 depends from independent claim 2, removal of the rejection of claim 3 is also requested for the same reasons.

Filed: June 19, 2001

Claim Rejections pursuant to 35 U.S.C. §103(a)

Claims 18 and 19 stand rejected pursuant to 35 U.S.C. §103(a) as obvious in view of EP '434 and further in view of Japanese Patent Publication JP 5-85196 (hereinafter referred to as "JP '196"). Applicants respectfully traverse these rejections for at least the foregoing reasons discussed with respect to EP '434 as well as the following reasons with respect to JP '196. Reconsideration is respectfully requested.

The Examiner has asserted that JP '196 teaches "use of a conductive adhesive for the specific purpose of electrically connecting wrapped threads to conductive leads." JP '196 teaches a wiring structure of a speaker in which gold threads (22 and 23) are woven into a damper (8). (Figs. 1, 16, page 14 paragraph 11, page 25-26 paragraph 46) The inner end of the gold threads is respectively soldered to copper leaves (19 and 20) of a coil bobbin (3) with solder (15). (Figs. 1, 16, 17, page 14 paragraph 11, page 25-26 paragraph 46) The inner periphery of the damper is properly positioned with respect to the outer periphery of the coil bobbin and then attached to the coil bobbin with adhesives (24). (Figs. 1, 16 and pages 14-15 paragraph 11, page 25-26 paragraph 46)

As the basis for the rejection, the Examiner asserts that JP '196 teaches applying a conductive adhesive to at least one of an electrical conductor wrapped around a thread and a lead of a moving coil on page 25 of the English translation of JP '196. Following a carefully reading, Applicants are only able to identify an adhesive taught by JP '196 to form the mechanical attachment of the damper to the coil bobbin. In fact, JP '196 teaches away from applying a conductive adhesive since JP '196 clearly teaches that gold threads are soldered to gold leaves to form electrical contact with the coil bobbin. Applicants therefore assert that it would not be obvious to one of ordinary skill in the art to apply a conductive adhesive to at least one of an electrical

conductor wrapped around a thread and a lead of a moving coil as disclosed by claims 18 and 19.

For at least the foregoing reasons, Applicants respectfully request removal of the 35 U.S.C. §103(a) rejection of claims 18 and 19.

Filed: June 19, 2001

Applicants believe that claims 1-19 are allowable in their present form and that this application is in condition for allowance. Accordingly, it is respectfully requested that the Examiner so find and issue a Notice of Allowance in due course. Should the Examiner deem a telephone conference to be beneficial in expediting allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below. No fees are believed to be due at this time; however, should any fees be deemed required, please charge such fees therefor to Deposit Account No. 23-1925.

Respectfully submitted,

Sanders N. Hillis

Attorney Reg. No. 45,712

SNH/sv

Attachment:

Marked-up version of the claims (p. 7)

BRINKS HOFER GILSON & LIONE

One Indiana Square, Suite 1600

Indianapolis, Indiana 46204 Telephone: (317) 636-0886

Telephone. (51)

Fax: (317) 634-6701

Serial No. 09/884,231 Filed: June 19, 2001

MARKED-UP VERSION OF THE CLAIMS

In the Claims:

Please amend claims 1 and 2 as follows:

- 1. (Twice Amended) A method of making a woven spider comprising selecting a thread of a cloth from which the spider is to be woven, wrapping an electrical conductor around the selected thread [with an electrical conductor] and weaving the wrapped thread at a selected location in the cloth.
- 2. (Twice Amended) A method of making a moving coil transducer comprising wrapping an electrical conductor around a thread [with an electrical conductor] and weaving the wrapped thread at a selected location in the cloth, after weaving the wrapped thread at the selected location in the cloth, forming the cloth into a spider, incorporating the spider into the moving coil transducer and making electrical contact to a[the] moving coil of the moving coil transducer through the electrical conductor wrapped around the thread.